**United States Department of State
and the Broadcasting Board of Governors
Office of Inspector General**

Office of Security
and
Intelligence Oversight

Program Management Review (Phase II) of the Anti-Terrorism Assistance Program

Report Number SIO/A-06-01, March 2006

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SUMMARY (U)

(U)   The Anti-Terrorism Assistance (ATA) Program of the Department of State (the Department) assists the U.S. government's war against international terrorism by enhancing the anti-terrorism skills of friendly nations, strengthening bilateral ties, and increasing respect for human rights. Since its inception in 1983, the program has trained and assisted more than 48,000 foreign security and law enforcement personnel from 141 countries, and since the terrorist attacks of September 11, 2001, the program has substantially expanded. The Office of the Coordinator for Counterterrorism (S/CT) provides policy guidance for the ATA Program, which the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance (DS/ATA) implements. DS/ATA manages training and assistance programs through a variety of platforms administered domestically and overseas.

(U)   The Office of Inspector General (OIG) undertook a two-part review to evaluate the management of the ATA Program in view of its recent growth. In Phase I, OIG assessed the implementation of program management responsibilities, the organizational structure of DS/ATA, and the management controls for weapons acquired for the DS/ATA in-country training programs abroad.[1] In Phase II, OIG sought to determine whether DS/ATA was using suitable procurement mechanisms to provide ATA training services and whether the procedures DS/ATA was following to develop and maintain high-quality anti-terrorism courses were achieving effective results.

(U)   The ATA Program has been successful in meeting the substantial needs for anti-terrorism training since September 11, 2001. Program training has grown from approximately 3,300 students from 45 countries in FY 2001 to nearly 5,000 students from 67 countries in FY 2004. In addition, training capacity has been increased through the establishment of in-country training facilities in Afghanistan, Colombia, Indonesia, Kenya, and Pakistan.[2] Nonetheless, OIG concluded that improvements should be made to ensure that program objectives continue to be achieved.

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[1] *Program Management Review (Phase I) of the Anti-Terrorism Assistance Program* (SIO/A-05-11, Jan. 2005).
[2] DS/ATA plans to open an in-country program in the Philippines.

(U) Specifically, OIG concluded that DS/ATA's use of cooperative agreements with Louisiana State University (LSU) and the Louisiana State Police Academy (LSPA) to provide ATA training services is not the most efficient method to obtain instructional services and instructional development support. Moreover, the cooperative agreement with LSU poses difficulties for DS/ATA in managing the ATA Program.

(U) OIG recommended that DS/ATA seek the advice of the Bureau of Administration's Office of the Procurement Executive (A/OPE) as it determines the suitable procurement mechanisms to use to obtain ATA training services when the existing cooperative agreements with LSU and LSPA expire.[3]

(U) OIG also concluded that DS/ATA's procedures for developing and maintaining high-quality anti-terrorism courses were effectively designed to yield high-quality training courses, but OIG identified areas where procedural improvements should be made and provided corresponding recommendations.

AGENCY COMMENTS (U)

(U) DS reviewed a draft version of this report and provided a written response in which it concurred with the report's recommendations. DS specifically responded to the recommendation addressing the development of a process to ensure that DS/ATA courses receive independent indepth course evaluations in accordance with the three-year review cycle. Because DS has already submitted the budgets for FY 2006 and FY 2007, DS plans to include requests for funding independent course evaluations in its FY 2008 budget process.

(U) S/CT also reviewed a draft version of this report and provided a written response in which it concurred with the report's recommendations. S/CT noted that the recommendations were consistent with S/CT's concerns about the efficacy of training, as well as mechanisms for quality control and evaluation. S/CT noted that it continues to support the findings and recommendations from the OIG DS/ATA Phase I report, specifically supporting the recommendation concerning the objectivity of having DS/ATA's Assessment and Review Branch perform the needs assessment and subsequent program evaluation for the country receiving ATA training. S/CT plans to work diligently to ensure that it addresses that particular Phase I report recommendation.

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[3]During February 2006, OIG learned that the cooperative agreements were extended to December 2006.

(U)   Specific DS and S/CT comments have been included in the body of the report where appropriate. The written comments are included in their entirety in the report's Appendices A and B, respectively.

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SCOPE AND METHODOLOGY (U)

(U)   This review is part of OIG's ongoing work of overseeing the Department's activities to counter international terrorism. OIG initiated this review to evaluate the management of the Department's ATA Program in view of its recent substantial growth. This second phase of the review provides OIG's assessment of:

- the suitability of the procurement mechanisms being used to provide ATA training services in view of the Federal Grant and Cooperative Agreement Act of 1977 (Grants Act)[4] and corresponding guidance issued by the Government Accountability Office (GAO) and the Department; and

- the procedures that DS/ATA follows to ensure quality in developing and maintaining anti-terrorism courses provided to friendly nation law enforcement personnel.

(U)   Fieldwork was principally performed between September 2004 and April 2005 at S/CT and relevant DS offices at the Department by OIG's Office of Security and Intelligence Oversight. OIG interviewed appropriate Department officials and reviewed applicable legislation and procurement guidance, needs assessment reports, course evaluation reports, end-of-training reports, program financial data, and other pertinent documentation. Owing to funding constraints, OIG team members did not visit any domestic or overseas ATA Program sites as part of this review and, therefore, did not test the implementation of program procedures at ATA's field locations.

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[4]Pub. L. No. 95-224; 31 U.S.C. §§ 6301-308 (1994).

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BACKGROUND (U)

(U) The ATA Program provides an increasingly important role in the U.S. government's war against international terrorism. Congress established the program in 1983, under the Foreign Assistance Act, to enhance the anti-terrorism skills of friendly nations, strengthen bilateral ties, and increase respect for human lives.[5] The program is based on the recognition that the United States cannot independently defeat international terrorism and cannot ensure the protection of its citizens, diplomatic personnel, and official facilities without the cooperation of foreign governments and the enhanced law enforcement capabilities of those nations. DS has broad discretion in deciding the mechanisms to use to carry out the ATA Program under the act.   DS/ATA implements and manages the program's operations and coordinates with other federal, state, and local agencies that assist in providing expertise, assessments, training, and facilities.

(U) The ATA Program has grown substantially since FY 1999, more than doubling its funding to a total of $96.4 million in FY 2004. The number of students and countries receiving ATA training has more than doubled. In FY 2004, approximately 4,900 students from 67 countries were enrolled in ATA-sponsored training courses.

(U) Domestically, ATA training is provided primarily at locations in Louisiana, Nevada, New Mexico, and Virginia. The sites include LSPA in Baton Rouge, the Las Vegas Police Training Academy, the New Mexico Institute of Mining and Technology facility in Socorro, the Department of Energy facility in Albuquerque, the Federal Bureau of Investigation's training facility in Quantico, and the Bureau of Alcohol, Tobacco and Firearms training facility in Front Royal. Foreign law enforcement personnel receive training in such topics as critical incident management, antikidnapping, explosive incident countermeasures, hostage negotiation, post-blast investigation, senior crisis management, protection, rural border operations, handling explosive-detector dogs, weapons of mass destruction operations, and mass casualty exercises. The foreign students come to the United States after extensive background and medical checks and generally stay from one to six weeks.

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[5]Pub. L. No. 87-195, Pt. II, § 571, codified in 22 U.S.C. § 2349aa.

(U)   ATA training is also provided overseas through various platforms, including the Flyaway Program, in-country programs, consultations, the Mobile Anti-Terrorism Training Teams (MATTs), and the International Law Enforcement Academy (ILEA) sites. Brief descriptions of these training platforms follow.

Flyaway Programs (U)

(U)   DS/ATA brings domestic training courses to the participating nations under the Flyaway Program because they cannot have their security personnel away for extended periods. Generally, the instructors that teach the domestic courses provide the instruction for this program. The host country and the U.S. mission provide training support, including the training facility and interpreters. Presenting the training in the participating nation allows DS/ATA to focus on the actual operating environment, infrastructure, and political and legal systems. Other advantages include cost-savings, larger class sizes, and reduction of visa overstays in the United States.

In-Country Programs (U)

(U)   DS/ATA offers training through bilateral arrangements with five participating nations: Afghanistan, Colombia, Indonesia, Kenya, and Pakistan.[6] The programs are long-term commitments, ranging from three to four years, with the goal of turning the facility over to the participating nation after having trained its personnel to maintain the program. The topics of courses offered, which may be specific to each country, include basic firearms qualification, protective formations, driver training, defensive tactics, antikidnapping training, post-blast investigation, tactical commander's crisis response team, weapons of mass destruction, counterterrorism seminars, protection, surveillance detection, and critical incident management training.

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[6]See footnote 2.

Consultations (U)

(U)   DS/ATA developed the consultations program in 2001 to provide training or advice in advanced skill sets for specific issues. Consultations are provided both domestically and in-country and assist countries with specific problems through sharing of expertise and solutions. Advantages of the program include providing solutions to problems on short notice and sharing of expertise among different levels of law enforcement personnel. Courses and issues include the Anti-Terrorism Executive Forum, security planning for major events, and canine explosive detector and dog handler training.

Mobile Anti-Terrorism Training Teams (U)

(U)   DS/ATA offers MATTs to provide flexible, adaptive, and responsive ATA training to participating nations. These programs usually occur on short notice and in response to a security event or threat. LSU provides the instructors, and courses include explosive incident countermeasures, protection, and crisis response team training. The advantages include providing training with a short leadtime at difficult overseas environments.

International Law Enforcement Academy (U)

(U)   The ILEA training concept was established in 1995 to help protect U.S. interests through international cooperation and to promote social, political, and economic stability by combating crime domestically and overseas. ILEA training platforms currently serve regions in Asia, Africa, and Europe, and DS/ATA offers training courses at the ILEA facilities in Bangkok, Budapest, and Gaborone.[7] This provides opportunities for wider student participation in ATA courses.

(U)   Students who attend the training courses are from countries in the corresponding regions. During 2004, DS/ATA conducted nine courses at ILEA facilities on such topics as transnational terrorism, the role of police in terrorism investigations, and the role of police executives in counterterrorism. ILEA and the U.S. missions provide training support for these courses.

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[7]The Department plans to construct ILEA facilities in Latin America.

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FINDINGS AND RECOMMENDATIONS (U)

ACQUIRING ATA TRAINING SERVICES (U)

(U)   Under the Grants Act, DS has broad discretion to determine the mechanism for obtaining ATA training services. Since 1992, DS has used cooperative agreements with LSU and LSPA to obtain ATA training, but did not periodically reexamine whether the continued use of the agreements was the most appropriate acquisition mechanism. During FY 2004, DS spent $21 million to obtain training services through two cooperative agreements, both of which are scheduled to expire in December 2005. One agreement is with LSU to provide instructional services and instructional development support, and the other is with LSPA for the use of its training facilities.[8]

(U)   OIG determined that it would be more efficient for DS to use a procurement contract rather than a cooperative agreement to obtain the instructional services and instructional development support because the agreement limited DS's direct control over ATA training. However, as detailed in later sections of this report, OIG recognizes that DS has changed its opinion about which acquisition mechanism is the most appropriate. Therefore, OIG recommends that DS seek and consider the advice of the Bureau of Administration's Office of the Procurement Executive (A/OPE) and the Office of the Legal Adviser (L) to assist in determining the appropriate procurement mechanism to use to obtain ATA training services.

(U)   The following sections discuss the history of DS's cooperative agreements with LSU and LSPA, the current DS position on cooperative agreements, the management control difficulties resulting from one such agreement, DS's plan for obtaining ATA training services upon expiration of the agreements, and OIG's conclusion supporting DS's current decision to use a procurement contract to obtain future ATA training services.

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[8]LSU subcontracts to Science Applications International Corporation (SAIC) for instructors. It also has a subgrant to use the New Mexico Institute for Mining and Technology facility to conduct the ATA course, Rural Border Patrol Operations.

History of DS's Use of Cooperative Agreements for ATA Training (U)

(U)   DS used cooperative agreements to obtain ATA training services for many years. The Department's existing cooperative agreements for anti-terrorism training instructors and facilities with LSU and LSPA have been in place since 1992. Every year, the Department has extended the agreements with one-year renewals to continue receiving the training services from those organizations.

Current DS Position on Cooperative Agreements for ATA Training (U)

(U)   DS currently has two cooperative agreements in place to provide training services for the ATA Program that are scheduled to expire in December 2005. As previously noted, one is with LSU to provide instructional services and instructional development support, and the other is with LSPA for the use of its training facilities. DS has changed its position regarding the use of cooperative agreements, which OIG reported on previously,[9] primarily to respond to recent advice from the Bureau of Resource Management (RM). RM advised DS to recompete its existing arrangements, and DS also recognized the management control difficulties that a cooperative agreement poses.

Management Control Difficulties (U)

(U)   The nature of a cooperative agreement significantly restricts DS/ATA from directly managing the ATA training program because the recipient of funds in such an agreement usually manages the program's resources. Although substantial involvement can be negotiated in such an arrangement, a cooperative agreement is designed to provide the recipient with primary management control over a project. ATA training needs are increasingly changing, especially since the terrorist attacks of September 11, 2001. Accordingly, DS/ATA's training focus must be flexible and change with the emerging terrorist threats and foreign countries' vulnerabilities. However, the cooperative agreement hampers DS/ATA's control and does not allow the flexibility that DS/ATA needs to manage the ATA training program efficiently.

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[9] *Audit of the State Department's Anti-Terrorism Assistance Program* (01-SIO-R-085, Sept. 2001).

(U)   Examples of how the cooperative agreement has restricted DS/ATA's management control are as follows.

- Science Applications International Corp. (SAIC) provides course managers and instructors for ATA training courses under a subcontract with LSU. Because of that subcontractor relationship, LSU prohibits DS/ATA from directly communicating with the instructors on such issues as information-gathering for curriculum development, quality assurance measures, and periodic course updating. In addition, if DS/ATA becomes aware of a particular SAIC instructor who is not effective, DS/ATA cannot require LSU to remove the instructor.

- Department procedures require DS to forward one full year of funds to A's Payment Management System for recipients of cooperative agreements, which limits DS in responding to changing executive policy imperatives. Throughout the year, S/CT, which provides national security policy guid-ance to DS/ATA, often asks DS/ATA to quickly redirect the ATA training focus and funding to a country or area that requires immediate assistance. Forwarding an entire year of funds to a cooperative agreement recipient seriously affects DS/ATA's flexibility to respond to such executive policy imperatives.

- For policy considerations, there has been increasing demand for Flyaway ATA training at overseas locations. DS/ATA has provided LSU with guidelines for Flyaway training; however, LSU is not required to follow them under the terms of its cooperative agreement. This has become problematic for DS/ATA in that it has no means of ensuring implementat-tion of priority ATA training with national security implications. For example, LSU resisted a DS/ATA request to conduct ATA training courses in Saudi Arabia and Yemen and agreed to do so if SAIC, LSU's subcontrac-tor, would agree. SAIC declined to support Yemen and did not fully sup-port the mission for Saudi Arabia because of security concerns, even though the U.S. embassy provided country clearance.

- Owing to the restrictive nature of the cooperative agreement between DS/ATA and LSU, DS/ATA was forced to locate another contractor on short notice to conduct an ATA training course in Jakarta. LSU and SAIC refused to conduct the course there because the SAIC course manager did not consider the logistical requirements of the course appropriate for the Flyaway mode of delivery. The cooperative agreement in this case did not provide a means for DS/ATA to compel LSU and SAIC to provide the course.

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DS's Plans To Obtain ATA Training Services After December 2005

(SBU) DS/ATA plans to replace the cooperative agreement it has with LSU for instructional services with a contract awarded under full and open competition procedures when the existing cooperative agreement expires. In DS/ATA's view, a contractual relationship with a training provider would enable DS/ATA to have direct contact with and greater control over ATA training instructors and ensure better ATA instruction quality.

(SBU) DS/ATA's plans regarding the cooperative agreement that it has with LSPA for training facilities are less clear. That cooperative agreement also expires in December 2006, and RM's Office of Grants Financial Management advised DS that it must seek competition for these ATA services. DS has given some consideration to building interim ATA training facilities at Aberdeen Proving Ground. However, cost implications may prevent DS from choosing this alternative because it would require a substantial capital investment. Consequently, DS is exploring other alternatives for ATA training facilities, which include seeking a new cooperative agreement with LSPA, a sole-source contract with LSPA, a cooperative agreement for award under competitive procedures, or a contract for award under full and open competition procedures.

OIG Conclusions (U)

(U)   OIG believes that procurement contracts are a more efficient method to obtain instructional services and instructional development support.   Moreover, OIG believes if DS uses a procurement contract, it would be able to overcome the management control restrictions faced by DS/ATA in its cooperative agreement with LSU.

(U)   OIG believes that DS should make its decision concerning the appropriate procurement mechanism to use in coordination with A/OPE and L. OIG also believes that DS should seek and strongly consider A/OPE's advice as it determines the appropriate mechanisms to use when the existing cooperative agreements with LSU and LSPA expire.

> **Recommendation 1:** (U) OIG recommends that the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance seek and consider the advice of the Bureau of Administration, Office of the Procurement Executive, the Office of the Legal Adviser, and OIG's conclusions, as it determines the appropriate procurement mechanisms to use to obtain Anti-Terrorism Assistance training services when the existing cooperative agreements with Louisiana State University and the Louisiana State Police Academy expire.

Department Comments (U)

(U)   DS concurred with this recommendation.

(U)   S/CT provided comments to the draft report stating that it concurred with each of the seven recommendations specified in the report. S/CT stated that the recommendations were very consistent with concerns it had about the efficacy of training as well as the mechanisms for quality control and evaluation. S/CT noted its plans to work vigorously in the coming months to address an outstanding recommendation from the OIG Phase I report. The recommendation addressed the objectivity of having DS/ATA's Assessment and Review Branch perform the needs assessment and subsequent program evaluation for the country receiving the training.

DS/ATA Quality Assurance Program (U)

(U)   DS/ATA's quality assurance program was established to ensure that high-quality courses are provided through domestic-based, in-country and Flyaway ATA training programs. By the program's design, DS/ATA assesses course quality during three principal stages of a course's life cycle: the course development process, course presentation worldwide, and indepth course evaluation. Overall, OIG believes that DS/ATA's quality assurance program is effectively designed to yield high-quality training courses for foreign law enforcement personnel. However, areas exist where improvements should be made. The following paragraphs summarize principal activities of the three stages involved in the quality assurance program and OIG's assessment of the program's management.

Course Development Process (U)

(U)   DS/ATA's Curriculum Development Division (DS/ATA/CDD) is responsible for developing the curriculum, including ensuring its quality, for 42 anti-terrorism training courses. Course development takes place through curriculum development, pilot-testing, and course translation phases.

Curriculum Development (U)

(U)   A contracting firm creates curriculum guides, training aids, and other anti-terrorism training materials needed to present a course to foreign participants. DS/ATA/CDD assigns a subject matter expert and a senior curriculum editor to assist the contractor during course development. DS/ATA/CDD requires the contractor to apply the ATA Curriculum Development Guidelines to ensure that all courses meet DS/ATA specifications and format. The subject matter expert and senior curriculum editor work closely with the contractor to ensure that course contents reflect accurate course goals, objectives, instructor guidance, logical content flow, grammar, and limited use of colloquialisms. The senior curriculum editor also ensures that the text can be translated and understood by most foreign participants.

(U)   When the contractor has drafted all required training course materials, the subject matter expert and senior curriculum editor review the draft materials and identify any areas that require correction. The contractor corrects and obtains approval for the draft materials as needed from the subject matter expert and senior curriculum editor and schedules a course walkthrough to ensure that its design is complete. During the course walkthrough, the contractor obtains further written comments to improve the course. The contractor then submits the revised course materials to DS/ATA/CDD for approval.

Pilot-Testing (U)

(U)   Anti-terrorism training course materials receive further review through pilot-testing where course materials, preliminarily approved by DS/ATA, are actually presented in a classroom setting on a limited basis. Pilot-testing provides a final opportunity to make significant changes to course materials before a course is approved for worldwide presentation. A course in this phase is presented at domestic ATA training sites to English-speaking students from the Philippines, Kenya, Indonesia, and Malaysia. A subject matter expert attends the course

presentations to review the materials firsthand, as they are actually presented, and to identify any problems requiring changes to the content. The curriculum development contractor usually makes any changes that are needed.

Course Translation (U)

(U)   Anti-terrorism course materials are translated into several base languages before being offered worldwide. DS/ATA obtains translation and quality control services from the Office of Language Services in the Bureau of Administration's Office of Operations (A/OPR/LS) and through a contract with a private company. DS/ATA reviews the translated course material and identifies minor errors primarily related to format, but relies on instructors, students, and interpreters to identify and provide comments concerning substantive translation errors. The latter errors usually surface during the course presentation. DS/ATA Program managers review the comments, follow up with the interpreters to discuss the nature of the translation errors, and contact A/OPR/LS and the private contractor to ensure that the corrections are made.

OIG Conclusions (U)

(U)   Procedures established for developing, pilot-testing, and translating ATA course materials are comprehensive and effectively designed and provide DS/ATA with appropriate opportunities to make corrections to the curricula at key points throughout the ATA course development process.

Course Presentation Worldwide (U)

(U)   After successfully developing, pilot-testing, and translating a course, DS/ATA presents it to students worldwide. DS/ATA measures quality assurance during this phase by collecting feedback from students and training service providers through student-prepared evaluation reports and instructor-prepared after-action reports. OIG believes that the reports effectively ensure that high-quality training courses are offered to foreign law enforcement officers, but that improvements should be made to ensure that DS/ATA properly and consistently uses the information collected from the reports. DS/ATA should develop and implement written policies and procedures describing how to use the information collected during the quality assurance process.

Student-Prepared Evaluation Reports (U)

(U)   DS/ATA measures the effectiveness of course materials from the perspective of its students through administering student evaluations designed to rate the course content, course material, and students' personal experience. Students objectively evaluate each ATA course by assigning numerical assessment ratings (i.e., strongly agree, disagree) to a series of standard questions focused on course quality. Students also provide subjective comments for each course, which are translated for DS/ATA's review. When students identify common course weaknesses, such as translation errors or formatting errors, DS/ATA uses the student-prepared evaluation reports to rewrite or update course materials. DS/ATA/CDD keeps the reports in its files for one year before destroying them.

(U)   DS/ATA proceeds cautiously in response to ATA course information that it obtains from student-prepared evaluation reports. Although it takes the reports seriously, DS/ATA recognizes that some students may not be completely objective in their course evaluations. For example, some students may rate a course very highly because they fear that a lower rating may limit the amount of ATA Program assistance their country receives in the future.

Instructor-Prepared After-Action Reports (U)

(U)   DS/ATA also measures the effectiveness of course materials by collecting feedback from course instructors in after-action reports. The reports provide DS/ATA Program managers with the training provider's overall assessment of course effectiveness, participants' qualifications, and a summary of participant comments about the quality of translated materials, reporting of participant incidents (e.g., a medical emergency), and suggestions for course improvements. When the reports identify issues meriting DS/ATA management attention, the program managers inform management of the anomalies and provide recommendations for corrections. DS/ATA also uses the reports to rewrite or update course materials as necessary.

OIG Conclusions (U)

(U)   Student-prepared evaluation reports and instructor-prepared after-action reports for ATA courses presented worldwide provide important contributions to the DS/ATA quality assurance program. However, OIG found that DS/ATA should make changes to improve the usefulness of the reported information to

ensure that DS/ATA properly and consistently evaluates, measures and improves its courses. Written policies and procedures describing how course developers and DS/ATA managers should use the information collected from student-prepared evaluation reports and instructor-prepared after-action reports would result in application of consistent methods for improving DS/ATA courses.

Student-Prepared Evaluation Reports (U)

(U)   During 2004, DS/ATA implemented a standardized student evaluation form designed to quantify students' responses, facilitate identification of course strengths and weaknesses, and facilitate trend analyses. Previously, each course developer created unique evaluation forms that collected varying information from the students. The current forms should enable DS/ATA to collect consistent information and more easily assess the effectiveness of ATA courses.

(U)   Notwithstanding the improved information that the new standardized form should yield, written policies and procedures for using the new form do not exist. Therefore, there is no assurance that ATA Program managers will consistently interpret information collected through the form or that the new form will continue to be used in the future. DS/ATA analysis of information provided through the form will provide a meaningful contribution to effective ATA training.

> **Recommendation 2:** (U) OIG recommends that the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance develop and implement written policies and procedures describing the collection and periodic analysis of data from student-prepared evaluation reports to assist in identifying the strengths and weaknesses of all Anti-Terrorism Assistance courses.

(U)   DS and S/CT concurred with this recommendation.

Instructor-Prepared After-Action Reports (U)

(U)   Before 2004, the course instructors did not prepare after-action reports consistently and the reports did not contain similar information from the various courses. For example, one instructor included charts illustrating the number of students who had submitted evaluation reports for ATA courses, while another did not. Because the reports did not contain consistent information from the instructors, they were of limited value to DS/ATA for analyzing information and improving the quality of ATA courses.

(U)   During 2004, DS/ATA took an important step to rectify the situation by implementing a standard reporting template for its training providers to use when preparing after-action reports. This should yield more consistent reporting by ATA training providers, which in turn should yield improved DS/ATA course analyses. DS/ATA also began requiring ATA training providers to assess students' capabilities for the training topics before and after completing the courses. This action should also yield improved DS/ATA analyses regarding the effectiveness of ATA courses.

(U)   While OIG is pleased that DS/ATA implemented new procedures for preparing after-action reports and assessing students' capabilities, it observed that DS/ATA did not have written standard operating procedures to ensure that its personnel use them. Most of the information that OIG obtained from DS/ATA officials about the operations of the ATA Program resulted from oral discussions. Written procedures are part of an effective system of internal control and are particularly necessary for a fluid organization such as DS/ATA, where Foreign Service officers fill the majority of full-time positions during rotational tours and must quickly learn how to manage a fast-paced program. As stated in the Government Auditing Standards, the lack of administrative continuity in government units increases the need for an effective system of internal control. [10] Written policies and procedures also ensure that valid and reliable data are obtained, maintained, and fairly disclosed in management reports.

(U)   OIG believes that DS/ATA should adopt written standard operating procedures that clearly describe templates for its instructors to ensure that DS/ATA properly and consistently evaluates, improves, and measures course results.

> **Recommendation 3:** (U) OIG recommends that the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance develop and implement written standard operating procedures describing the collection and periodic analysis of data from instructor-prepared after-action reports to assist in identifying the strengths and weaknesses of all Anti-Terrorism Assistance courses.

(U)   DS and S/CT concurred with this recommendation.

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[10]GAO-03-673G, p. 131.

Indepth Course Evaluations (U)

(U)   DS/ATA's quality assurance process also includes an independent indepth evaluation of ATA course curriculum on a three-year cycle, once a course is presented worldwide. DS/ATA also rewrites the courses after it receives the indepth course evaluation. DS/ATA administers a contract with the Department and TAC Technologies to obtain the independent qualified experts to perform the evaluations.[11]

Process (U)

(U)   The DS/ATA three-year cycle goal to evaluate the courses confirms whether the courses present current anti-terrorism standards and practices. Each independent indepth evaluation involves two subject matter experts from TAC Technologies, who work with a subject matter expert from DS/ATA/CDD. TAC Technologies' experts have an extensive background in law enforcement, the military, anti-terrorism training techniques, security, and other security-related fields.[12]   DS/ATA/CDD provides overall supervision for the evaluations that focus on various factors contributing to course quality (e.g., course goals, objectives, materials, equipment, training facilities, language interpreters, and instructor qualifications) and compliance with applicable security and adult learning standards. The indepth course evaluation takes from one to six weeks to complete.

(U)   TAC Technologies has provided DS/ATA with the results of 17 course evaluations from the 42 courses offered. Table 1 provides an overview of the indepth course evaluations that DS/ATA has completed.

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[11]TAC Technologies has expertise in security and provides subject matter experts on a contract basis to the U.S. government. Before 2005, TAC Technologies met 13 C.F.R., 124, Subpart A - 8(a) Business Development/Small Disadvantaged Business Status Determinations requirements, commonly referred to as 8(a) requirements. It no longer meets them and will be ineligible to bid on future contracts.
[12]Future indepth ATA course reviews will not include subject matter experts from DS/ATA/CDD in order to achieve greater independence.

Table 1

Status of Indepth Course Evaluations

for Eligible Courses Listed in the DS/ATA's Course Catalog

(as of March 31, 2005)

Status of Review	Number of Courses	Percentage of Courses
Current	9	53%
Overdue	7	41%
Plans to Review	1	6%
Eligible Courses*	17	100%

* OIG did not include courses listed in DS/ATA's current course catalog that were developed after 2001, were under development, or were offered through DS/ATA's Consultation Branch or ILEA.

Qualifications of ATA Course Evaluators (U)

(U)   The Department's contract with TAC Technologies for performing ATA course evaluations requires the firm to submit resumes for the subject matter experts to DS/ATA for review and approval before initiating the evaluations. Such advance DS/ATA approval provides assurance that qualified personnel will perform the evaluations. TAC Technologies may provide another subject matter expert for a course evaluation if the firm provides written notice to the contracting officer that explains why the substitution is necessary. The firm must also provide the contracting officer with a resume and other requested information to demonstrate the qualifications of the proposed substitute.

OIG Conclusions (U)

(U)   OIG reviewed the DS/ATA Program's management of each phase in the indepth course evaluation process and found that it is effectively designed to ensure high-quality training courses for foreign law enforcement personnel. OIG believes, however, that improvements should be made to the indepth course evaluation process to ensure that courses receive timely and independent reviews and that qualified experts evaluate the courses.

Process (U)

Indepth Course Evaluations (U)

(U)   OIG reviewed the indepth course evaluation process to determine whether DS/ATA reviewed its anti-terrorism courses effectively. OIG found that owing to limited resources and a lack of priority, DS/ATA did not ensure that all anti-terrorism courses received the course evaluations every three years as required by DS/ATA's three-year review cycle goal. OIG concluded that outdated courses may result in the Department's providing ineffective anti-terrorism training techniques to foreign nationals and may hinder the program's efforts in combating international terrorism.

(U)   OIG reviewed the courses that DS/ATA offered in its training catalog during FY 2004 and found that of the 42 total courses identified, 17 courses were eligible for review under the three-year review cycle goal. As demonstrated in Table 1, for the 17 courses, OIG found that DS/ATA ensured that indepth course evaluations were completed for nine courses (53%), were overdue for seven courses (41%) and planned for one (6%) course. OIG concluded that DS/ATA should develop a process to ensure that each course receives a timely and independent indepth evaluation.

(U)   To determine whether DS/ATA completed the evaluations in a timely manner, OIG compared the date that the independent evaluator reviewed each course to the date that each course was due for review according to DS/ATA's three-year review cycle goal. If DS/ATA evaluated the course within the three-year cycle, OIG considered DS/ATA to have met its goal. If a course was outside of that range, the course was considered to be overdue for review.

(U)   OIG found that DS/ATA lacks resources to ensure that the indepth course evaluations were performed according to the three-year cycle goal because the evaluations were not given the same priority as other DS/ATA quality assurance program elements. OIG concluded that DS/ATA only met its review cycle goals in roughly half of the eligible courses and that it should develop a process to ensure that the independent indepth course evaluations receive greater priority and are completed in a timely manner. OIG believes that the evaluations are an invaluable tool for ensuring that course participants learn current anti-terrorism training techniques.

> **Recommendation 4:** (U) OIG recommends that the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance develop a process to ensure that all courses receive independent indepth course evaluations in accordance with the three-year review cycle goal.

(U)   DS agreed with this recommendation, but noted that it has not budgeted for independent audit evaluations for each course for FY 2006 or FY 2007. DS/ATA would not be able to satisfy this recommendation until the budget submission for FY 2008 is drafted. DS would need to include estimates for the course evaluations for each course in the submission and then seek approval from Department management and request funding from the Office of Management and Budget.

(U)   S/CT concurred with this recommendation.

Course Rewrite Process (U)

(U)   OIG reviewed the DS/ATA course rewrite process to determine whether DS/ATA revised its courses in a timely manner and provided current information to anti-terrorism course participants. DS/ATA revises its courses using information obtained from the independent indepth course evaluations. OIG found that for the nine courses that received an indepth course evaluation, DS/ATA completed revisions for four courses, was revising one course and had four courses overdue for revision. OIG concluded that outdated courses may result in the Department's providing less than optimal anti-terrorism training techniques to foreign nationals and may hinder the program's efforts in combating international terrorism.

(U)   Examples of how outdated courses may result in the Department's providing less than optimal training techniques are as follows.

- The Hostage Negotiation course received an indepth course evaluation during 2001, but was last rewritten in 1997. The contractor reported that the course materials were outdated because the threat from terrorism has changed the types of hostage situations. Because the current curriculum is outdated, instructors must provide significant degrees of missing information for dealing with the terrorism related hostage situations. DS/ATA does not plan to rewrite the course at this time because it does not have the required funding. By providing limited information, DS/ATA may not be fully increasing the proficiency of negotiation skills of course participants.

- The Critical Incident Management course received an indepth course evaluation in March 2002, but was last rewritten in 2001. The contractor reported that revising lesson objectives; addressing crisis incident management challenges such as time, space, and organization; and including more recent crisis incident case management studies would improve the course. Lessons learned from the events of September 11, 2001, also show that more than one organization may be involved in addressing time-sensitive, high risk, and dynamic situations. However, DS/ATA does not plan to rewrite the course at this time because it does not have the required funding. Likewise, by providing limited information, DS/ATA may not be fully increasing the crisis incident management skills of course participants.

(U)   OIG found that some courses had not been rewritten owing to DS/ATA's scheduling of priorities that resulted in a lack of available subject matter experts to oversee the revision process. DS/ATA advised OIG that not all courses are rewritten after receiving indepth course evaluations because a course may not warrant revision. DS/ATA prioritizes the revisions based on the three-year review cycle goal and policy decisions from its management. While OIG is pleased that DS/ATA revises its courses when necessary, OIG believes that DS/ATA should commence course rewrites within one year of the completion of independent indepth course evaluations to ensure that comprehensive training techniques are provided to course participants.

> **Recommendation 5:** (U) OIG recommends that the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance commence necessary course rewrites within one year of completion of the independent indepth course evaluations.

(U)   DS and S/CT concurred with this recommendation.

Qualifications of ATA Course Evaluators (U)

(U)   OIG reviewed five ATA indepth course evaluations performed by TAC Technologies to determine whether qualified experts evaluated the courses. OIG found that DS/ATA did not have resumes for the firm's evaluators who performed the evaluations. When asked about the lack of resumes, DS/ATA told OIG that it was not aware that nonapproved individuals performed the course evaluations, but also could not confirm that qualified individuals actually performed the work. Therefore, OIG concluded that the results of the affected course evaluations could be questioned.

(U)   Consequently, DS/ATA should obtain resumes from TAC Technologies for the evaluators who performed course evaluations for DS/ATA and determine whether qualified individuals actually performed the work. If it determines that unqualified individuals performed the course evaluations, DS/ATA should inform the contracting officer that contract procedures were not followed and assess the results of affected evaluations to determine their validity.

Recommendation 6: (U) OIG recommends that the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance obtain resumes for the evaluators from TAC Technologies who performed indepth course evaluations and determine whether qualified individuals actually performed the work. If the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance determines that unqualified individuals performed the evaluations, it should inform the contracting officer that contract procedures were not followed and assess the results of affected evaluations to determine their validity.

Recommendation 7: (U) OIG recommends that the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance ensure that it obtains and reviews resumes for evaluators who will perform indepth course evaluations to ensure that they are qualified to perform the work and produce valid results.

(U)   DS and S/CT concurred with these recommendations.

RECOMMENDATIONS (U)

Recommendation 1: (U)   OIG recommends that the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance seek and consider the advice of the Bureau of Administration, Office of the Procurement Executive, the Office of the Legal Adviser, and OIG's conclusions, as it determines the appropriate procurement mechanisms to use to obtain Anti-Terrorism Assistance training services when the existing cooperative agreements with Louisiana State University and the Louisiana State Police Academy expire.

Recommendation 2: (U)   OIG recommends that the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance develop and implement written policies and procedures describing the collection and periodic analysis of data from student-prepared evaluation reports to assist in identifying the strengths and weaknesses of all Anti-Terrorism Assistance courses.

Recommendation 3: (U)   OIG recommends that the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance develop and implement written standard operating procedures describing the collection and periodic analysis of data from instructor-prepared after-action reports to assist in identifying the strengths and weaknesses of all Anti-Terrorism Assistance courses.

Recommendation 4: (U)   OIG recommends that the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance develop a process to ensure that all courses receive independent indepth course evaluations in accordance with the three-year review cycle goal.

Recommendation 5: (U)   OIG recommends that the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance commence necessary course rewrites within one year of completion of the independent indepth course evaluations.

Recommendation 6: (U) OIG recommends that the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance obtain resumes for the evaluators from TAC Technologies who performed indepth course evaluations and determine whether qualified individuals actually performed the work. If the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance determines that unqualified individuals performed the evaluations, it should inform the contracting officer that contract procedures were not followed and assess the results of affected evaluations to determine their validity.

Recommendation 7: (U) OIG recommends that the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance ensure that it obtains and reviews resumes for evaluators who will perform indepth course evaluations to ensure that they are qualified to perform the work and produce valid results.

ABBREVIATIONS (U)

A	Bureau of Administration
A/LS	Office of Language Services
A/OPE	Office of the Procurement Executive
A/OPR	Office of Operations
DS	Bureau of Diplomatic Security
DS/ATA	Office of Anti-Terrorism Assistance
DS/ATA/CDD	Curriculum Design Division
GAO	Government Accountability Office
ILEA	International Law Enforcement Academy
LSPA	Louisiana State Police Academy
LSU	Louisiana State University
MATT	Mobile Anti-Terrorism Training Team
OIG	Office of Inspector General
RM	Bureau of Resource Management
SAIC	Science Applications International Corporation
S/CT	Office of the Coordinator for Counterterrorism

OIG Report No. SIO/A-06-01, Program Management Review (Phase II) of the ATAP - March 2006

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APPENDIX A

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COMMENTS FROM THE BUREAU OF DIPLOMATIC SECURITY

United States Department of State

*Assistant Secretary of State
for Diplomatic Security*

Washington, D.C. 20520

MAM 0 6 2006

**MEMORANDUM
UNCLASSIFIED**

TO: OIG – Mr. Howard J. Krongard

FROM: Richard J. Griffin

SUBJECT: Office of Security and Intelligence Oversight
Program Management Review (Phase II) of the Anti-Terrorism
Assistance Program
Draft Report – October 2005

Attached is the Bureau of Diplomatic Security's response to your
November 10, 2005, memorandum for the draft review of the subject report.

Attachment:
        DS' review/response to Recommendation 4.

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Office of Security and Intelligence Oversight
Program Management Review (Phase II) of the
Anti-Terrorism Assistance Program
Draft Report
October 2005

(U) **Recommendation 4**: OIG recommends that the Bureau of Diplomatic Security, Office of Anti-Terrorism Assistance develop a process to ensure that all courses receive independent in-depth course evaluations in accordance with the three-year review cycle goal. (Action: DS)

(U) **DS Response (12/8/05):** While ATA agrees with the recommendation, ATA has not budgeted for independent audit/evaluations for each course for FY06 or FY07. ATA would not be able to satisfy this recommendation until the budget submission for FY08 is drafted. Estimates for course evaluations for each course would have to be included in the submission, and then it would have to be approved by management at DOS and then funded by OMB.

Clearances:

DS/DSS/T – C Lamb   ok
DS/T/ATA – D Rosenstein   ok

Drafted by: DS/T/ATA: N Wychules: 12/5/05: x34037

UNCLASSIFIED

APPENDIX B

COMMENTS FROM THE OFFICE OF THE COORDINATOR FOR COUNTERTERRORISM

United States Department of State

Washington, D.C. 20520

November 23, 2005

SENSITIVE BUT UNCLASSIFIED

TO: OIG - John E. Lange, Acting

FROM: S/CT - Amb. Henry A. Crumpton

SUBJECT: S/CT Comments on Draft Program Management Review (Phase II) of the Anti-Terrorism Program

Thank you for the opportunity to offer comments on the draft review of the Department's Anti-Terrorism Assistance training program. S/CT concurs with the seven recommendations specified in this draft. We note that these recommendations are very consistent with concerns we have had about the efficacy of training, as well as mechanisms for quality control and evaluation. In this context we would also note the continuing importance of the Phase 1 recommendation that "the objectivity of having DS/ATA's Assessment and Review Branch perform the needs assessment and subsequent program evaluation for the country receiving ATA training" needs to be addressed. We will work diligently in coming months to ensure that this recommendation is dealt with effectively.

As you are aware, the OIG is near concluding its inspection of S/CT and, in that context, has looked closely at S/CT's oversight and management of the ATA training programs, funding and policy guidance for which is the responsibility of S/CT. We look forward to the inspectors' further recommendations. In the meantime, we welcome the recommendations in the draft Program Management Review and, if adopted as drafted, are prepared to do our part to ensure that they are implemented in a timely fashion.

SENSITIVE BUT UNCLASSIFIED